

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE V,

*Plaintiff,*

Case No. 1:20-cv-08490-GBD

**-against-**

HARVEY WEINSTEIN, ROBERT WEINSTEIN,  
MIRAMAX HOLDING CORP., MIRAMAX FILM NY,  
LLC f/k/a MIRAMAX FILM CORP., THE WALT  
DISNEY COMPANY, DISNEY ENTERPRISES, INC.  
and DOE CORP. 1-10,

**JOINT STIPULATION**  
**AND [PROPOSED] ORDER**  
**STAYING ACTION**

*Defendants.*

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**WHEREAS**, independent mediators are currently carrying out a mediation (“Mediation”) to resolve the claims of individuals arising out of allegations of sexual misconduct by Defendant Harvey Weinstein allegedly occurring prior to June 30, 2005;

**WHEREAS**, independent mediators have designed and are currently implementing a claims resolution program (“Program”) to resolve the claims of individuals arising out of allegations of sexual misconduct by Defendant Harvey Weinstein allegedly occurring on or after June 30, 2005;

**WHEREAS**, Plaintiff is participating, or seeking to participate in, the aforementioned Mediation and/or Program;

**WHEREAS**, in the interests of judicial economy and conservation of party resources, Plaintiff and the Defendants (together, the “Parties”) jointly stipulate to stay this action unless and until Plaintiff elects to resume the litigation and request that such stay be lifted (the “Stay”);

**WHEREAS**, should Plaintiff resolve her claims against Defendants via the Mediation and/or Program, Plaintiff will thereafter promptly discontinue her claims in this action with prejudice, and without costs to any of the Parties; and,

**WHEREAS**, the entering into of this joint Stipulation shall not constitute a waiver of Plaintiff's right to make a motion to remand this action if and when the Stay is lifted, and Plaintiff expressly reserves the right to make such a motion if and when the Stay is lifted.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned, that:

1. The above-captioned action is hereby stayed pending further Order of the Court;
2. After the lifting of the Stay, if any, the Parties will confer on a proposed schedule for Plaintiff's remand motion and for Defendants to answer, move or otherwise respond to Plaintiff's Complaint; and,
3. After the lifting of the Stay, if any, the Parties will also confer on a Proposed Case Management Plan and Scheduling Order in this action; and,

**IT IS FURTHER STIPULATED AND AGREED**, by and between the undersigned, that signatures via facsimile or email, and in counterpart, shall be deemed good and sufficient for all purposes, and that this Stipulation and [Proposed] Order may be electronically filed with the Clerk of the Court without further notice.


Dated: March 26, 2021  
New York, New York

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Attorneys for Defendant *Robert Weinstein*

SO ORDERED.

Date: \_\_\_\_\_, 2021  
New York, New York

\_\_\_\_\_  
HON. GEORGE B. DANIELS  
United States District Judge

LATHAM & WATKINS LLP

CRAVATH, SWAINE & MOORE LLP

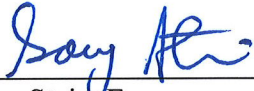
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Attorneys for Defendant *Robert Weinstein*

SO ORDERED.

Date: \_\_\_\_\_, 2021  
New York, New York

\_\_\_\_\_  
HON. GEORGE B. DANIELS  
United States District Judge